

From: [Ingram, Campbell](#)
To: [Grindstaff, Joe@DeltaCouncil](#); [Delta Plan Comments@Deltacouncil](#)
Cc: [Ullrey, Nancy@DeltaConservancy](#)
Subject: Comments on the 2/14 Draft Delta Plan from the Delta Conservancy
Date: Friday, March 11, 2011 3:47:36 PM
Attachments: [DC comments 2_14_11 draft Delta Plan_031111.doc](#)

Dear Joe,

Thank you for the opportunity to provide the attached comments on the February 14, draft of the Delta Stewardship Councils Delta Plan. These comments were compiled by Conservancy staff and reviewed by our Strategic Plan and Policy Subcommittee of the Board of Directors. Please let me know if you have any questions or concerns.

Thank you,
Campbell

Campbell Ingram

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Delta Conservancy Comments Regarding the February 14, 2011, Delta Plan

Overall:

- No mention of the Delta Conservancy and its role in implementing and assisting with developing the Delta Plan (WC Sections 85210(h); 85212; 85300(b); 85302(h); and 85320(g)).

Specific:

Page; Line No.	Comment, Suggested Addition, or Edit	
1-3; 14-40	<p>Comment: Legislative quotes taken from SBX 7 1, sections dealing with the Delta Protection Commission and the DSC; similar language in the Conservancy’s section was not selected.</p> <p>Suggested addition: add <i>The Delta’s history is rich with a distinct natural, agricultural, and cultural heritage. It is home to the community of Locke, the only town in the United States built primarily by early Chinese immigrants. Other legacy communities include Bethel Island, Clarksburg, Courtland, Freeport, Hood, Isletown, Knightsen, Rio Vista, Ryde, and Walnut Grove.</i> (Public Resources Code Section 32301(f))</p>	
1-4; 6-11	<p>Comment: what are the consistent conclusions to the sentences beginning with “While some policy implications...”</p> <p>Suggested edit: “While some of the policy implications of these studies are disputed, the studies’ underlying conclusions are consistent: Delta resources are at risk. These resources include water supplies and ecosystem health, levees that provide public and infrastructure safety, and the base of the Delta’s economy—agriculture.”</p>	
1-4; 15	<p>Comment: In its interim strategic plan, the Delta Conservancy acknowledges that the Delta is a diverse region and is not a “one size fits all” sort of place.</p> <p>Suggested edit: delete “of the community” and change to “of its communities.”</p>	
2-2; 35	<p>Comment: The tone and language of SBX7 1 is one of cooperation and collaboration across several state agencies, and specifically among the Delta Protection Commission, the Delta Conservancy, and the Delta Stewardship Council. Water Code Section 85204 says: <i>The council shall establish and oversee a committee of agencies responsible for implementing the Delta Plan. Each agency shall coordinate its actions pursuant to the Delta Plan with the council and the other relevant agencies.</i>” The council has established a committee with DPC and the Conservancy and others to coordinate planning and implementation efforts, and this is a good place to acknowledge that progress.</p> <p>Suggested edit: delete the first sentence about the council being the agency to implement the Delta Plan and replace it with the statute language; then add <i>In addition, the Council has established committees with state and federal agencies, including the Delta Conservancy and the Delta Protection Commission, to coordinate planning and implementation efforts.</i></p>	
2-4; 17	<p>Comment: Why is Santa Clara’s HCP/NCCP included in this list?</p> <p>Suggested addition: add Yolo County to the list of HCP/NCCPs; delete or explain why Santa Clara’s is on the list.</p>	

6-1; 3-8	Suggested addition: add the Delta Conservancy's interim strategic plan to the list of ongoing work from which the Council will receive input	
6-1; 15	Comment: define "ecosystem services"	
6-1; 18	Comment: define "resilience"	
6-1; 18-19	Suggested edit: Actions taken from this point forward will contribute to defining <i>determining</i> the future Delta and the health of its ecosystem.	
6-1; 25-26	Suggested addition: Insert new paragraph: <i>The Sacramento-San Joaquin Delta Conservancy is charged to act as a primary state agency to implement ecosystem restoration in the Delta (Public Resources Code Sec. 32322). In its recently completed interim strategic plan, the Delta Conservancy developed its vision and mission statements regarding its leadership role in achieving ecosystem restoration in the Delta. The interim strategic plan also lists the Delta Conservancy's guiding principles for how it will pursue its mission and vision through collaboration and cooperation with local, state, federal, and other interested parties.</i>	
6-3; 18	Comment: using the subheading "Findings" is problematic and gives the impression of the Delta Plan as being pre-decisional before the environmental impact report is out. Suggested edit: change "Findings" to "Declaration."	
6-3; 20-22	Comment: This first sentence does not strongly support the declaration and lets the reader infer that the habitat that currently exists is not natural. Suggested edit: <i>The Delta was transformed more than 100 years ago from a vast, complex, and diverse system of meandering sloughs and habitats into its more engineered and homogeneous waterways and habitats.</i>	
6-3; 30	Suggested addition: build your "Reference" or "Works Cited" section as you produce the drafts of the Delta Plan so readers can identify which specific work is being cited.	
6-3; 33	Comment: the last part of the sentence "...restoration to the historical Delta is not possible" is accurate and actually highlights some of the conflicting goals in the Delta. For example, attempting to restore the Delta to its historic ecosystem would reduce drinking and agricultural water quality for many in the region.	
6-3; 35	Comment: "regime shift," while accurate, is scientific jargon. Suggested edit: In addition, recent evidence related to the Pelagic Organism Decline suggests that the <i>ecosystem's food chain</i> has undergone a regime shifted... Comment: add definition of Pelagic Organism Decline.	
6-4; 1-24	Comment: These three bulleted declarations are precisely what the Delta Conservancy is promoting in interim strategic plan and will develop policies and priorities for as it completes the final version of its strategic plan. The Delta Conservancy anticipates that the policies and priorities it develops around these three declarations will be included in the Delta Plan, pursuant to Water Code Sections 85300(b) and 85302(h).	
6-5; 28-38	Comment: This section also needs to include migratory corridors	

	for terrestrial and avian species, not just fish species. The Delta Conservancy will assist in developing additional text in future versions of the Delta Plan.	
6-6; 32-38	Comment: In completing its strategic plan, the Delta Conservancy will be addressing climate change policies regarding Delta ecosystem restoration and anticipates that this will be included in the final Delta Plan.	
6-7; 1-18	Comment: Under the Sacramento-San Joaquin Delta Conservancy Act (Public Resources Code 32300 et seq.), the Delta Conservancy is required to carry out ecosystem and habitat restoration, facilitate safe harbor agreements, and support water quality efforts; the Delta Conservancy is also allowed to own and manage land in the Delta. Given its statutory mandates, the Delta Conservancy is actively pursuing establishing policies and priorities in several of the listed categories. The Delta Conservancy anticipates that the policies and priorities it develops, especially around the categories of land acquisition, habitat restoration, streamline permit processes, safe harbor agreements, and water quality, will be included in the Delta Plan, pursuant to Water Code Sections 85300(b) and 85302(h).	
9-1; 27-28	Comment: define “inappropriate recreational use”	
9-4; 11-22	Comment: The Delta Conservancy is the state agency leading the effort to coordinate Delta planning efforts. Under Public Resources Code Section 32360(b)(3), the Conservancy may fund a program within the Conservancy for economic sustainability in the Delta, based on the Delta Protection Commission’s economic sustainability plan. The Delta Conservancy is in a position to lead the collaboration and cooperation in coordinating local planning efforts with regional, state, and federal planning efforts.	
9-5; 29-31	Suggested edit: About 75 percent of the Delta’s total land area is Prime Farmland, the <i>category designating the most productive category of type of farmland</i> . The division of agricultural lands into smaller parcel sizes adversely affects the viability of agriculture <i>and also interferes with migratory trails for terrestrial species</i> .	
9-7; 25-39	Comment: Under the Sacramento-San Joaquin Delta Conservancy Act (Public Resources Code 32300 et seq.), the Delta Conservancy is required to support efforts that advance environmental protection and the economic well-being of Delta residents. Given its statutory mandates, the Delta Conservancy is actively pursuing establishing policies and priorities in several of the listed categories. The Delta Conservancy anticipates that the policies and priorities it develops, especially around the categories of protecting and preserving Delta agriculture and working landscapes; providing increased opportunities for tourism and recreation; and promoting Delta legacy communities and economic vitality in the Delta in coordination with the Delta Protection Commission, will be included in the Delta Plan, pursuant to Water Code Sections 85300(b) and 85302(h).	